EPA United States Environmental Protection Agency

Region 9 Enforcement Division
75 Hawthorne Street
San Francisco, CA 94105

Inspection Date(s):	April 12, 2022		
Time:	**Entry:** 8:45am	**Exit:** 1:30pm	
Media:	Water		
Regulatory Program(s)	Clean Water Act NPDES		
Company Name:	BETA Offshore		
Facility or Site Name:	Platform Eureka		
Facility/Site Physical Location:	Platform Eureka, Offshore Long Beach, Pacific Ocean Lease OCS-P-0301		
Geographic Coordinates:	Latitude: 33°35'45.37"N, Longitude: 118° 8'29.62"W		
Mailing address:	111 W. Ocean Blvd. Suite 1240 Long Beach, CA 90802		
Facility/Site Contact:	Diana Lang	**Title**: HSE Manager	
	Phone: 562-628-1529	**Email**: dlang@memorialpp.com	
Facility/Site Identifier:	NPDES Permits CAG280000 and CAF001149		
NAICS:	211111 - Crude petroleum and natural gas extraction		
SIC:	1311		

Facility/Site Personnel Participating in Inspection:

Name	Affiliation	Title	Email
Diana Lang	BETA offshore	HSE Manager	dlang@amplifyenergy.com
Blake Bennet	BETA offshore	Lead Operator	blake.bennett@amplifyenergy.com
Jazmin Martin	BETA offshore	HSE Specialist	jazmin.martin@amplifyenergy.com

EPA Inspector(s):

Adam Howell	US EPA	Environmental Engineer	Howell.Adam@epa.gov
Jim Polek	US EPA	Environmental Engineer	Polek.Jim@epa.gov

Inspection Report Author:	Adam Howell	415-947-4248
		Date:
Supervisor Review:	Eric Magnan ERIC MAGNAN Digitally signed by ERIC MAGNAN Date: 2022.05.27 17:34:30 -07'00'	415-947-4179
		Date:

SECTION I – INTRODUCTION

I.1 Purpose of the Inspection

On April 12,2022, Adam Howell and Jim Polek from the U.S. EPA Region 9 Enforcement Division (hereafter, we or inspection team) conducted a Clean Water Act (CWA) National Pollutant Discharge Elimination System (NPDES) inspection of the BETA Offshore (BETA or Discharger) – Platform Eureka (hereafter, Facility or Platform) offshore oil and gas platform. The purpose of the inspection was to evaluate compliance with the requirements of the EPA Region 9 NPDES Permit Nos. CAG280000 and CAF001149 (hereafter, Permit).

During the inspection we evaluated the accuracy and reliability of the Discharger's self-monitoring and reporting program and the Facility onsite generated waste streams, treatment processes, and discharges to the Pacific Ocean. The announced inspection consisted of two parts: a records review and a general Facility walk through. The onsite Facility Representatives were Diana Lang (HSE Manager, BETA), Jazmin Martin (HSE Specialist, BETA and Blake Bennet (Lead Operator). Upon arriving at the Platform we met with the Facility Representatives, presented our CWA credentials and explained the purpose of the inspection.

SECTION II – FACILITY / SITE DESCRIPTION

II.1 Facility Description

Platform Eureka is located offshore of Long Beach, CA and produces oil and gas from Lease OCS-P-0301. The Platform was first installed in July 1984 and began production in March 1985. Platform Eureka is approximately ten miles from land in federal waters, has 60 well slots, and is at a water depth of 700 feet. As of October 1, 2017, Platform Eureka had a cumulative oil production of 44,860,000 barrels (bbls) and cumulative gas production of 10,162,000 mcf (thousand cubic feet).

At the time of the inspection, the Facility was not in "production" operations. Until production is resumed, potential sources of discharge are:

- Deck drainage (washdown, rainwater, drip pan and work area drains – (Discharge 004)
- Sanitary and Domestic Wastes (Discharge 005)
- Fire control system water (Discharge 008)
- Non-contact Cooling Water (Discharge 009)

Platform Eureka is connected to Platform Elly by a pipeline carrying gross product.

II.2 Wastewater Sources

Note the discharge number (i.e., Discharge 002) referenced throughout this report refers to the type of wastewater discharged at the corresponding outfall point as designated in the Permit. A general description of the process train(s) for each of the above-mentioned discharges, and additional fluids that may be generated at the Facility is described below:

Produced Water (Discharge 002) is a by-product of crude oil and natural gas extraction on Platform Eureka. Produced water and crude oil are sent to Platform Elly, via pipeline, for processing. At platform Elly, the fluids are separated into three streams: oil, produced water and natural gas. The oil is shipped to shore via a subsea pipeline. The produced water is processed and some of the processed produced water is returned to Platform Eureka and Platform Ellen for injection into the reservoir or geological formation, an enhanced recovery process. The produced natural gas is utilized in turbines on Platform Elly to generate power for the facilities. Separated crude oil is sent via Pipeline P00547 from Platform Elly to Amplify Energy's shore-based facility for further processing. Platform Elly has monitoring requirements for produced water discharge including oil & grease (daily), toxicity (quarterly) and zinc (annually). The Permit sets limits on oil & grease concentrations in discharged produced water of 29 mg/L monthly average and 42 mg/L daily maximum.

Well Treatment Completion and Workover Fluids (Discharge 003) are utilized during well workover operations, but trace amounts may be present in the produced water once the well is returned to production. No discharge of Well Treatment Completion and Workover Fluids has been reported for many years.

Deck drainage (washdown, rainwater, drip pan and work area drains – Discharge 004) is collected throughout the platform. The top most platform level (Drill Deck) and next level (Production Deck) are enclosed with berms and floor trenches that flow to the sump tank on the Subdeck. Fluid in the sump tank is pumped to a disposal well. If the deck drainage flows ever exceed the capacity of the sump, additional flows can be sent to the emergency sump.

Sanitary Wastewater (Discharge 005) is treated onsite at the Facility with an Omnipure environmental marine sanitation device (MSD) Model No. 12MXMP with serial No. 15-12MXMP-D033301B, which is United States Coast Guard (USCG) approved (Photographs 10 and 11). Samples are collected daily from a sample port on the downstream end of the Omnipure (Photograph 9) and tested for residual chlorine. The treated water is discharged overboard (Photograph 15). The MSD unit is sized for a maximum of 7,500 gallons per day (gpd).

Fire control system water (seawater released during training, testing, and maintenance of fire protection equipment – Discharge 008) is composed of pure seawater. The Fire control water is sent to a disposal well with the deck drainage (Discharge 004).

Non-contact Cooling Water (Discharge 009) originates as seawater and is used to cool the platform's generators. Operators inject liquid sodium hypochlorite (Photograph 5) as a biofilm inhibitor until chlorine concentrations are between 0.2 – 0.5ppm (Photographs 13 & 15). Seawater is pumped through the Platform and then discharged through 10" diameter pipes at a

constant flow rate of 68,571 BWD (Barrels of Water per Day). Chlorine concentrations are reported on Discharge Monitoring Reports (DMRs) quarterly.

II.3 Wastewater Treatment

Sanitary wastewater (Discharge 005) is the only wastewater stream to be treated onsite at the Facility. Discharge 005 is treated with an Omnipure MSD (Photograph 10). The self-contained treatment system oxidizes and disinfects sewage by combining it with seawater and electrolyzing the combination in an electrochemical cell which produces hypochlorite for disinfection. Facility personnel stated that the MSD is manually backwashed twice weekly (backwash is sent to deck drainage) and inspected annually by a contractor.

Domestic and Sanitary Wastes (Discharge 005), Footnote 2, of the Permit states "any facility which properly operates and maintains a marine sanitation device (MSD) that was certified by the United States Coast Guard (USCG) under Section 312 of the Act shall be deemed to be in compliance with permit limitations for sanitary wastes and the requirements for total residual chlorine do not apply." Sanitary waste flows are estimated by tracking the average number of people on the platform and reported on DMRs monthly.

Produced water (Discharge 002) is treated on Platform Elly using a three-step separation process. Treatment consists of a free-water knockout to separate water from oil and gas, a heater treater for further separation, and then a flotation cell (WEMCO model 120). After being separated, produced water volumes in excess of what can be injected into the geologic formation from Platforms Ellen or Eureka may be discharged from Platform Elly.

II.4 Compliance History

EPA staff performed Clean Water Act compliance inspections on Platforms Elly and Ellen in March 2017. The inspection team found issues related to BETA's monitoring and sampling methodology, notably for oil & grease. Solutions for those issues were negotiated with BETA and memorialized in an Administrative Order on Consent (AOC) with Docket No. CWA-309-2018-0002 and effective date of April 10, 2018.

The AOC was an agreement between BETA and EPA to rewrite and implement the sampling protocol for produced water discharges on their platforms and resolve NPDES violations on Platform Elly.

The AOC was terminated on June 7, 2018, when EPA determined that BETA had substantially met all the requirements of the AOC.

A CWA compliance inspection on Platform Eureka was performed by EPA on September 24, 2019.

DMRs for Platform Eureka reviewed by the inspection team indicated no reported effluent violations during the period of review (July 2019 through March 2022). DMRs indicated that well treatment and workover fluids (Discharge 003) were used on Platform Eureka or Ellen twenty-four (24) times during the same time period. Any trace amount of these fluids recovered from production were sent to Platform Elly with produced fluids.

On October 7, 2021, EPA received a report from BETA Offshore indicating that a leak in Pipeline P00547 carrying crude oil from Platform Elly to shore was discovered on October 2, 2021. The report states that "the pipeline was shut in and a vacuum was initiated to stop the leak." An email received from Diana Lang on March 30, 2022 stated that oil production has been suspended since October 2, 2021.

SECTION III – OBSERVATIONS

- The NPDES permit, daily reports, and DMRs were all well organized and readily available on an electronic share drive accessible on the Platform. Daily log sheets were clear, well kept, and easy to understand.

- The Facility appears to be generally well maintained and clean. Paint was fresh in many areas due to BETA's focus on catch-up maintenance since production was shut-down.

- The Omnipure MSD appeared to be in good working order.

SECTION IV – AREAS OF CONCERN

The presentation of areas of concern does not constitute a formal compliance determination or violation.

No areas of concern were identified.

APPENDICES

- Appendix 1 – Photograph Log
- Appendix 2 – Inspection Checklist

Appendix 1 – Photograph Log

The photographs were taken during the inspection by Jim Polek using an Olympus Tough TG-5 digital camera. Original copies of the photos are maintained by EPA Region 9.

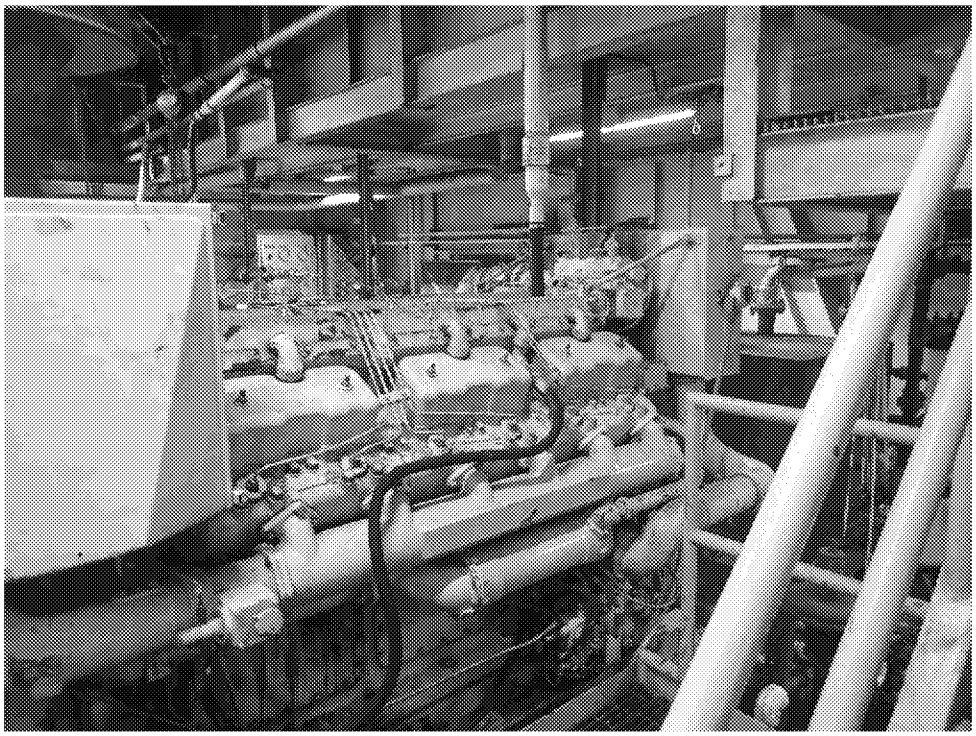

Photo 1: Generator cooled with non-contact water.

Photo 2: Cooling water line leaving generator.

Photo 3: Cooling water line entering generator.

Photo 4: Fire water pump (LHS pipe pulling water up, RHS pipe discharge overboard.

Photo 5: Cooling water chlorination.

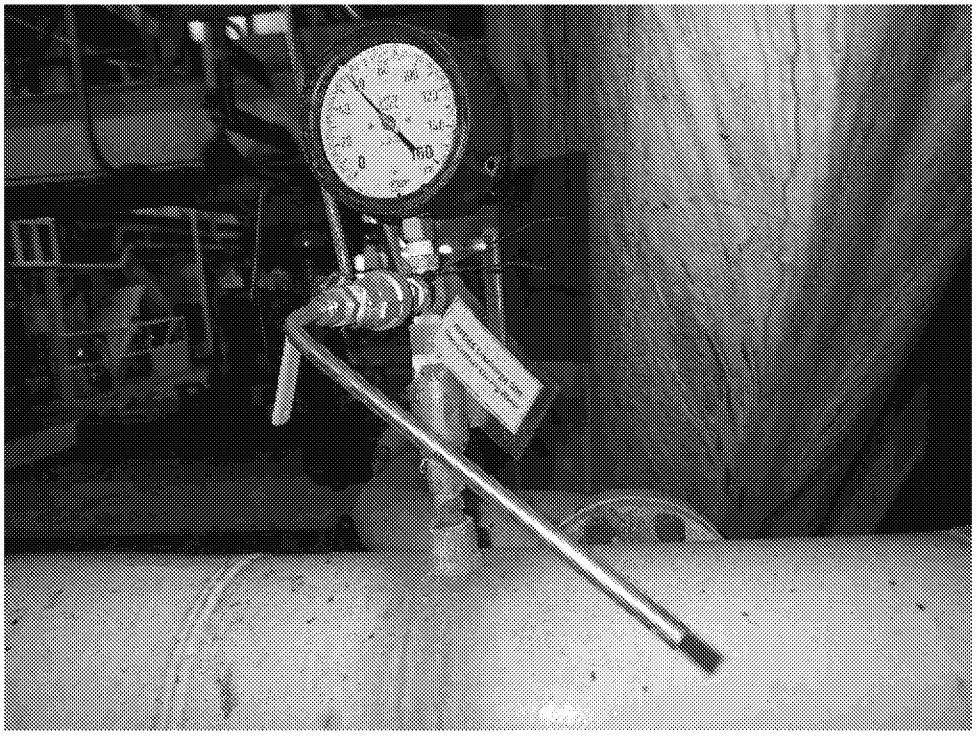

Photo 6: Sampling location for non-contact cooling water.

Photo 7: Alternative sample location for non-contact cooling water.

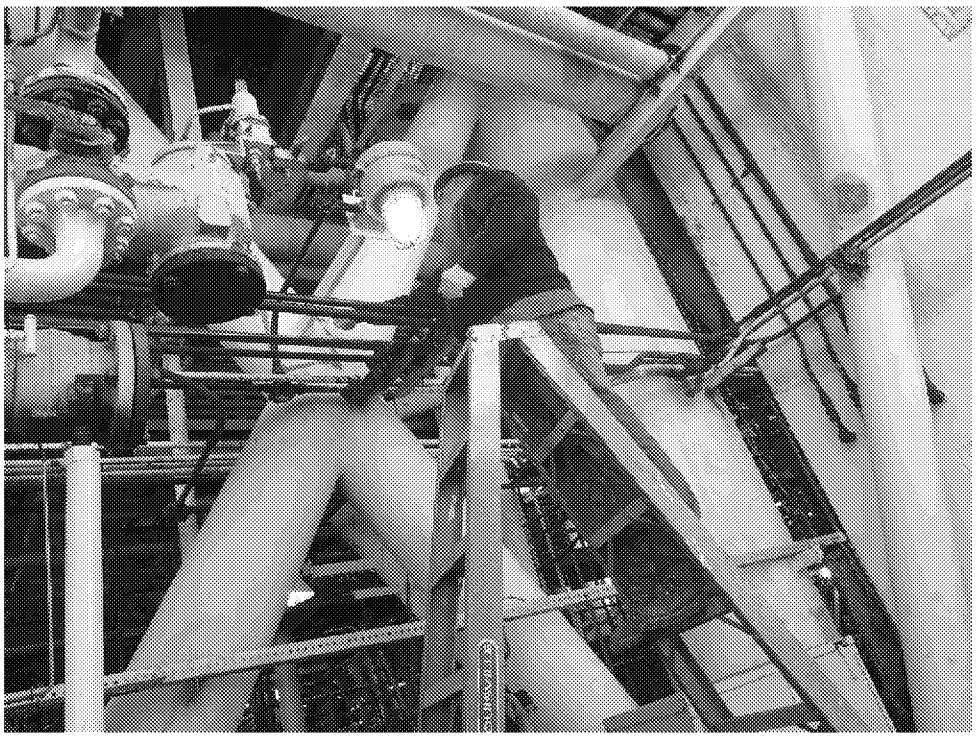

Photo 8: Active painting.

Photo 9: Sampling location for domestic wastewater treatment unit (Omnipure).

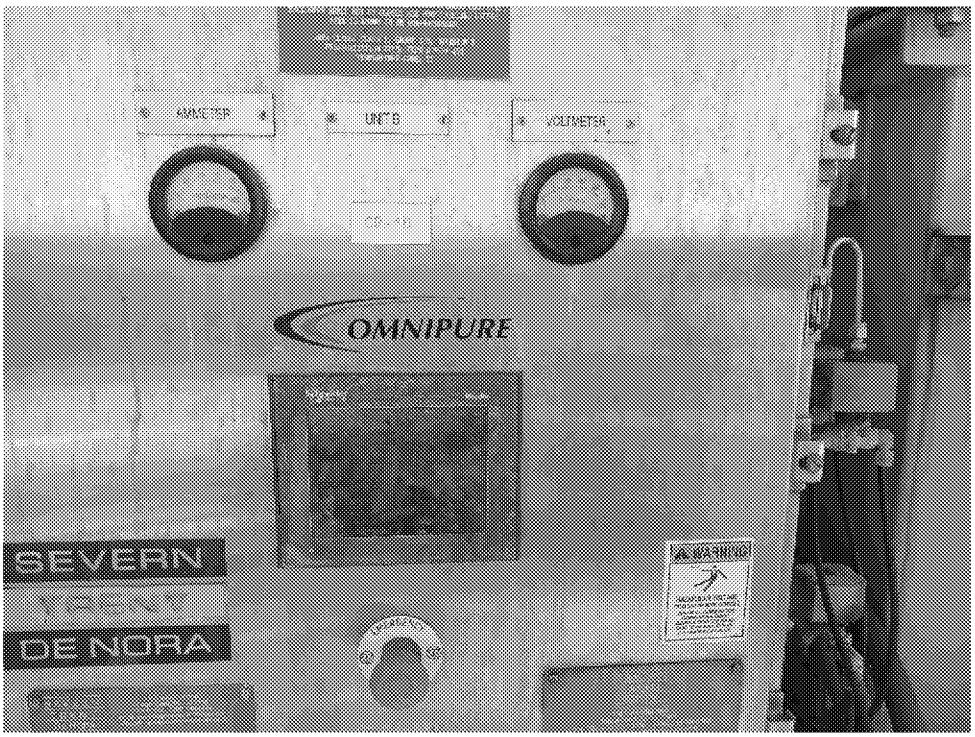

Photo 10: Omnipure control panel.

Photo 11: Operator sampling domestic wastewater effluent.

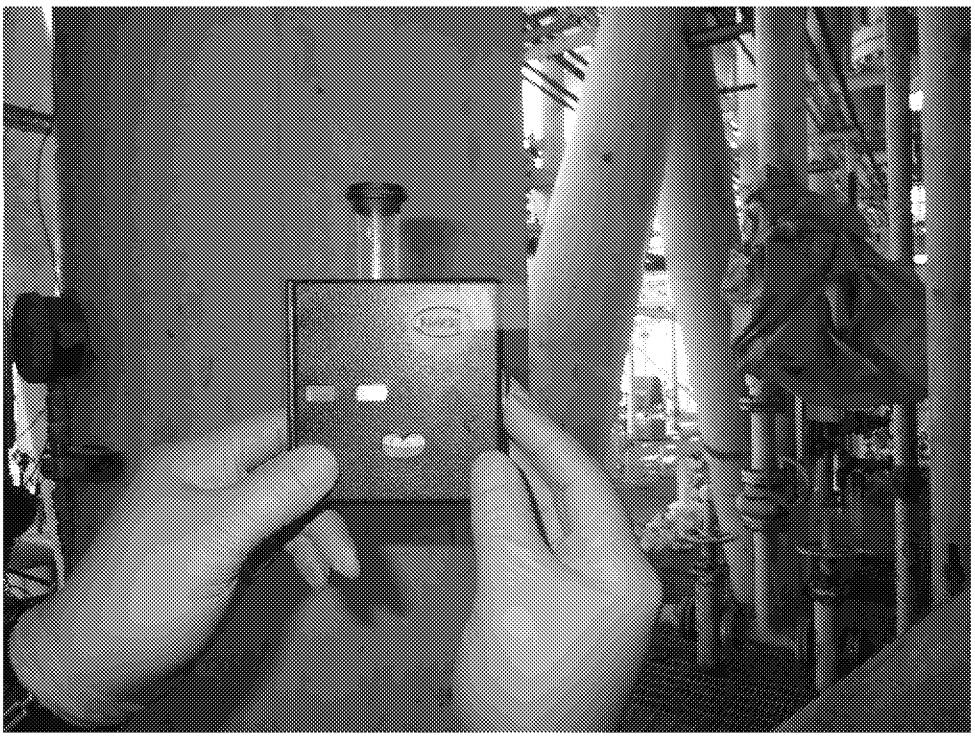

Photo 12: Color wheel for estimating chlorine concetrations (~1.5 mg/L) for wastewater.

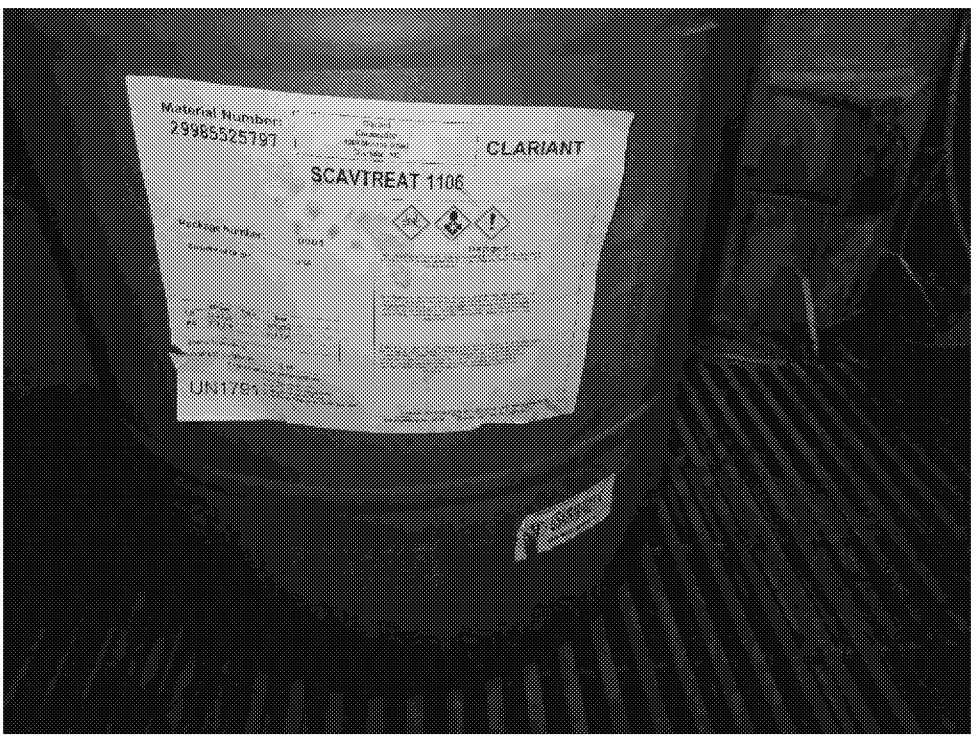

Photo 13: Label of Scavtreat 1106 used to chlorinate non-contact cooling water.

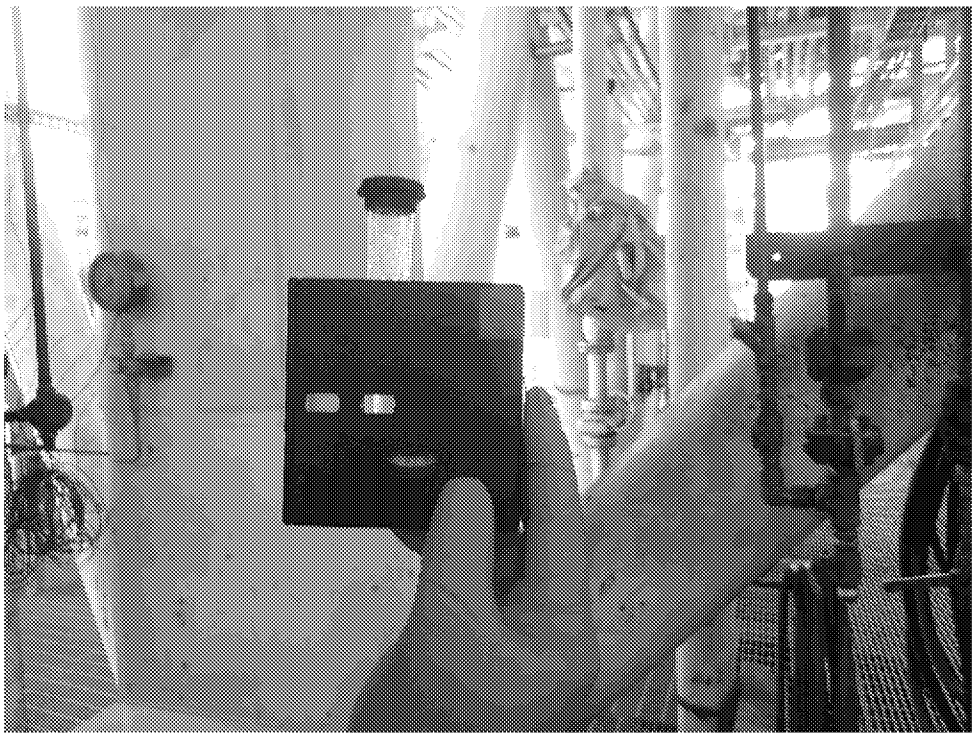

Photo 14: Color wheel for non-contact cooling water sample (~0.0-0.2 mg/L)

Photo 15: Domestic wastewater discharge pipe.

Photo 16: Non-contact cooling water discharge.

Appendix 2 - INSPECTION CHECKLIST

I. GENERAL

Facility Type	☐Municipal ☐Industrial ☐Agricultural ☐Federal ☒Oil & Gas
Inspection Type	☒ Compliance Evaluation (non-sampling) ☐ Compliance Sampling ☐ _____
Weather ☒ Dry ☐ Rain ☐ Clear ☐ Recent Rains ☐ Overcast ☐ _____	
Was facility notified in advance?	Yes ☒ No ☐
Presented credentials?	Yes ☒ No ☐
Notes:	

II. RECORDS AND REPORTS REVIEW

RECORDS	Available onsite?			
	Yes	No	N/A	Not Inspected
NPDES permit	☒	☐	☐	☐
Monitoring and reporting records for past 5 years	☒	☐	☐	☐
Maintenance records	☒	☐	☐	☐
Operational records/ log books	☒	☐	☐	☐
Auxiliary power check logs	☐	☐	☐	☒
Employee Training	☒	☐	☐	☐
Have any spills been reported since last inspection?	☒	☐	☐	☐
Spill records	☒	☐	☐	☐
Have any bypasses been reported since last inspection?	☐	☒	☐	☐
Bypass records	☐	☒	☐	☐
Notes:				

REPORTS	Completed in time frame and frequency as required by permit?			
	Yes	No	N/A	Not Inspected

Notification of Non-compliance	☐	☐	☒	☐
Notification of spills	☒	☐	☐	☐
Notification of bypass	☐	☐	☒	☐
Pollution Prevention Plan	☐	☐	☒	☐
Spill prevention control and countermeasure (SPCC) plan	☐	☐	☒	☐
POTW: Biosolids Monitoring/Management Reports	☐	☐	☒	☐
POTW: CSO/ I & I Reports	☐	☐	☒	☐
POTW: Pretreatment Reports	☐	☐	☒	☐
Other:	☐	☐	☐	☐
Other:	☐	☐	☐	☐
Notes:				

III. SELF MONITORING PROGRAM

SAMPLING RECORDS & DMRS	Yes	No	N/A	Not Inspected
Are DMRs submitted in timeframe and frequency required by permit?	☒	☐	☐	☐
Sampling Records have: Dates, times, location, & name of individual performing sampling:	☒	☐	☐	☐
Lab Reports have: Analytical methods, results, dates and time of analyses:	☐	☐	☐	☒
Are samples collected and preserved using methods approved in 40 CFR Part 136?	☐	☐	☐	☒
Lab Report results are correctly transcribed to DMR:	☐	☐	☐	☒
Detection limits are reported for "less than" results:	☐	☐	☒	☐
Does discharger monitor effluent more frequently than required by Permit?	☐	☒	☐	☐
If Yes, is all data collected reported on DMRs?	☐	☐	☒	☐
Notes:				

SAMPLE MONITORING	Yes	No	N/A	Not Inspected
Are sample locations and methods representative of Effluent?	☒	☐	☐	☐
Representative of Influent?	☐	☐	☒	☐
Representative of Receiving Waters?	☐	☐	☒	☐
What Flow Measurement Device is utilized?				
☐ Flume ☐ Weir ☐ Meter: ☐ Calculation ☐ Other_____				
Device appears to be functioning properly without obstructions:	☐	☐	☒	☐

Is flow meter calibration available onsite?		☐	☐	☒	☐
Date of last calibration				
Calibration performed by				
Notes:				

ANALYTICAL MONITORING	Yes	No	N/A	Not Inspected
Does discharger perform on-site analysis for compliance monitoring?	☐	☒	☐	☐
List parameters analyzed on-site:				
Are records of equipment calibration available?	☐	☐	☒	☐
Is the on-site laboratory certified?	☐	☐	☒	☐
Certification Number				
Expiration Date				

COMPLIANCE MONITORING RATING CODE	Satisfactory	Marginal	Unsatisfactory	Not Rated
	☐	☐	☐	☐

Notes:

IV. SITE REVIEW OPERATIONS AND MAINTENANCE

General	Yes	No	N/A	Not Inspected
Is the facility as described in the permit/fact sheet for the following?				
Processes	☒	☐	☐	☐
Treatment Units	☒	☐	☐	☐
Flow and/or Production Rates	☒	☐	☐	☐
Outfalls & Monitoring Locations	☒	☐	☐	☐
Receiving Waters	☒	☐	☐	☐
Have there been significant changes in operation since last inspection or permit reissuance?	☒	☐	☐	☐
Plant schematic is up to date	☐	☐	☐	☒
Notes: Production has been shut down since October when the Platform to Shore pipeline leak was discovered.				

Treatment Units & Supporting Equipment	Yes	No	N/A	Not Inspected
Hydraulic and loadings rates appear consistent with the permit and plant design	☐	☐	☒	☐
Tanks, floats, pipes, valves, etc. appear in good working condition	☒	☐	☐	☐

Equipment appears adequately maintained and functioning correctly	☒	☐	☐	☐
There is no visible evidence of hydraulic short-circuiting	☐	☐	☒	☐
Process controls appear adequate	☐	☐	☒	☐
No safety concerns observed that may interfere with operation, maintenance, monitoring	☒	☐	☐	☐
Notes:				

Operation & Maintenance	Yes	No	N/A	Not Inspected
O &M Manuals are organized and maintained for use:	☐	☐	☐	☒
The maintenance activities, spare parts on-hand, and equipment available appear adequate to ensure continuous operation of treatment system:	☒	☐	☐	☐
Is a maintenance management program in place?	☐	☐	☒	☐
Number of open work orders:				
Oldest date of open work order:				
Notes:				

Emergencies / Power Outage	Yes	No	N/A	Not Inspected
Alarm systems for power and equipment failure:	☐	☐	☐	☒
Auxiliary power available and maintained:	☒	☐	☐	☐
Notes:				

Stormwater	Yes	No	N/A	Not Inspected
Does facility have exposure and potential to discharge Stormwater?	☐	☒	☐	☐
Is discharger subject to Multi Sector General Permit (MSGP)?	☐	☒	☐	☐
If Yes→ Filed Notice of Intent?	☐	☐	☒	☐
If Yes → Stormwater Pollution Prevention Plan (SWPPP) available	☐	☐	☒	☐
Is there evidence of unauthorized (non-stormwater) discharges?	☐	☒	☐	☐
Are there signs of spills to soil, groundwater, or surface water?	☐	☒	☐	☐
Is adequate equipment available for spill cleanup and containment?	☐	☐	☒	☐

Are the following areas observed to be free of materials to prevent stormwater pollution?	Yes	No	N/A	Not Inspected
Storage areas	☐	☐	☒	☐
Fueling areas	☐	☐	☒	☐

Maintenance areas	☐	☐	☒	☐
Loading and unloading areas	☐	☐	☒	☐
Waste disposal areas	☐	☐	☒	☐
Chemicals are stored in secondary containment:	☐	☐	☒	☐
Notes:				

V. FINAL EFFLUENT AND RECEIVING WATER MONITORING

EFFLUENT APPEARANCE	Yes	No	N/A	Not Inspected
Clear	☐	☐	☐	☒
Colorless	☐	☐	☐	☒
Free of oil sheen	☐	☐	☐	☒
Free of floatables	☐	☐	☐	☒
Free of objectionable odor	☐	☐	☐	☒
Notes: *Discharges are not visible from the platform.*				
RECEIVING WATER APPEARANCE				
Free of visible plume	☒	☐	☐	☒
Free of foam and sheen	☒	☐	☐	☐
Free of erosion at the discharge point	☐	☐	☒	☐
Free of bottom deposits, algae growth	☐	☐	☒	☐
Notes:				

VI. SINGLE EVENT VIOLATIONS

Were any Single Event Violations (SEV) Observed?	☐ Yes ☒ No
If Yes Describe SEV:	SEV CODE